

*Universitas Education, LLC v. Nova Group, Inc.*, Case No. 11-1590-LTS-HBP (S.D.N.Y.)

**July 2, 2014 Letter to the Hon. Laura Taylor Swain**  
**Exhibit B**

Crotty, P.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

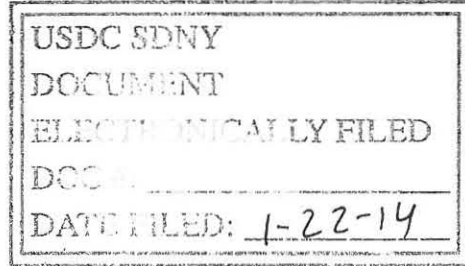
-----X  
YUKOS CAPITAL S.A.R.L.,

Petitioner,

-against-

DAO SAMARANEFTEGAZ,

Respondent.  
-----X



**10-cv-06147 (PAC)**  
**[PROPOSED] ORDER**

HONORABLE PAUL A. CROTTY, United States District Judge:

WHEREAS, Yukos Capital S.a.r.l. ("Yukos Capital") sought enforcement of an arbitration award ("Award") issued in its favor against DAO Samaraneftgaz ("Samaraneftgaz") by the International Court of Arbitration of the International Chamber of Commerce ("ICC") in New York on August 15, 2007 (the "Award");

WHEREAS, on July 24, 2012, this Court determined that it had personal jurisdiction over Samaraneftgaz for purposes of enforcement of the Award;

WHEREAS, on August 6, 2013, this Court granted Yukos Capital's motion for summary judgment to confirm the Award;

WHEREAS, on October 2, 2013, this Court entered final judgment in the amount of \$185,907, 785.41 (the "Judgment");

WHEREAS, Samaraneftgaz has not satisfied the Judgment and has not posted a bond pending its appeal to the Second Circuit;

WHEREAS, Yukos Capital moved for turnover of assets sufficient to satisfy the Judgment and an order restraining any further transfer of Samarnaeftegaz's assets to Samaraneftegaz's shareholder or corporate affiliates until such time as Samaraneftegaz satisfies the Judgment or posts a bond;

WHEREAS, the Court finds, for the reasons stated in its Opinion and Order dated January 9, 2014, that Yukos Capital is entitled to the requested relief, and that Yukos Capital will suffer irreparable harm if Samaraneftegaz is not enjoined from transferring assets to its shareholder or corporate affiliates as set forth below:

IT IS HEREBY ORDERED, pursuant to Federal Rule of Civil Procedure 69(a)(1)(a) and CPLR 5225(a) that Samaraneftegaz shall pay the sum of \$185,907,785.41 to Yukos Capital in satisfaction of the Judgment by check or wire transfer to the Gibson Dunn & Crutcher LLP client trust account for the benefit of Yukos Capital within fourteen (14) days of the signing of this order, or, in the alternative, post a supersedeas bond in the full amount.

IT IS FURTHER ORDERED, pursuant to Federal Rule of Civil Procedure 69(a)(1)(a), CPLR 5222 and Federal Rule of Civil Procedure 65, that until such time as Samaraneftegaz satisfies the Judgment or posts a bond as set forth above, it is enjoined and restrained from paying any dividends, making loans, or otherwise transferring any assets or funds to its shareholder and corporate affiliates <sup>without fan consideration</sup> including but not limited to Neft-Aktiv LLC and OJSC Rosneft. PM

Dated: New York, New York  
January 22, 2014

SO ORDERED

*Paul M. Smith*  
OJSC